



February 23, 2015  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

RE: Mosaic NetworX LLC  
EB Docket No. 06-36; CY2014

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2014 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of the Mosaic NetworX LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to [croesel@tminc.com](mailto:croesel@tminc.com). Thank you for your assistance in this matter.

Sincerely,

/s/ Carey Roesel

Carey Roesel  
Consultant to Mosaic NetworX LLC

cc: Matt Hiles - Mosaic NetworX  
file: Mosaic NetworX - FCC CPNI  
tms: FCCx1501

Enclosures  
CR/gs

EB Docket 06-36

**Attachments:** Accompanying Statement explaining CPNI procedures

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

## **Customer Proprietary Network Information Certification Accompanying Statement**

MOSAIC NETWORKX LLC has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, ("section 222") and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

MOSAIC NETWORKX LLC provides private telecommunications services over dedicated lines to large enterprise and carrier customers pursuant to ICB contracts. MOSAIC NETWORKX LLC's customer contracts uniformly contain confidentiality agreements that address customers' private information. It is MOSAIC NETWORKX LLC's policy not to disclose CPNI except as specifically set out in its contracts with its customers and where required by law.

### **Safeguarding against pretexting**

- MOSAIC NETWORKX LLC takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. MOSAIC NETWORKX LLC is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

### **Training and discipline**

- MOSAIC NETWORKX LLC has an express disciplinary process in place for violation of the MOSAIC NETWORKX LLC's CPNI practices and procedures. MOSAIC NETWORKX LLC employees are required to review and abide by MOSAIC NETWORKX LLC's Code of Conduct, which prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

### **MOSAIC NETWORKX LLC's use of CPNI**

- MOSAIC NETWORKX LLC uses CPNI for the following purposes:
  - (1) To initiate, render, maintain, repair, bill and collect for services
  - (2) To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - (3) For network maintenance; and
  - (4) As required by law.

- MOSAIC NETWORKX LLC does not distribute CPNI to third parties for their sales or marketing purposes. Nor does MOSAIC NETWORKX LLC share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.
- MOSAIC NETWORKX LLC does not share, sell, lease or otherwise provide CPNI to any third party except pursuant to appropriate non-disclosure agreements. MOSAIC NETWORKX LLC will not otherwise disclose CPNI to a third party except when required by a lawfully issued government subpoena.

#### **Additional safeguards**

- MOSAIC NETWORKX LLC does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.
- MOSAIC NETWORKX LLC has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- MOSAIC NETWORKX LLC designates one or more officers, as an agent or agents of the MOSAIC NETWORKX LLC, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- MOSAIC NETWORKX LLC does not disclose CPNI over the phone and does not allow for online access to CPNI.
- In the event of a breach of CPNI, MOSAIC NETWORKX LLC will comply with all applicable breach notification laws.

*Daltz*